

In the Matter of:

Jane Doe

v.

The University of VA, et al

Akia Haynes Hale

September 6, 2024



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Akia Haynes Hale

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9/6/2024

1	IN THE UNITED STATES DISTRICT COURT	
2	FOR THE WESTERN DISTRICT OF VIRGINIA	
3	JANE DOE,)
4	Plaintiff,)
5	v.) Civil Action No.
6	THE UNIVERSITY OF) 3:23-cv-00018
7	VIRGINIA, et al.,)
8	Defendants.)
9		
10	DEPOSITION of AKIA HAYNES HALE in the	
11	above-entitled matter, held via	
12	video-conference, on September 6, 2024,	
13	stenographically reported by Jacqueline	
14	Bennett, Registered Professional Reporter and	
15	Notary Public in and for the Commonwealth of	
16	Virginia.	
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1 P R O C E E D I N G S

2 (The proceedings commenced at 10:02 a.m.)

3 A K I A H A Y N E S H A L E, having been duly
4 called and sworn, testified as follows:

5 EXAMINATION

6 BY MS. ABDNOUR:

7 Q. So Ms. Haynes Hale, what would you like me to
8 call you? That's my first question for you. Would
9 you like to be Akia or Ms. Haynes Hale or something
10 else?

11 A. Akia is easier.

12 Q. Okay. Thanks, Akia. I appreciate it. I'm
13 going to go through sort of a little bit of just
14 background and housekeeping information before we get
15 into the questions.

16 I'm Liz Abdnour. I'm with the law firm
17 Abdnour Weiker and I represent the plaintiff who we're
18 going to be referring to as Jane Doe today.

19 MS. ABDNOUR: Just for the court reporter, if
20 anybody accidentally uses her real name, we just ask
21 that you change it to Jane Doe in the record.

22 MR. BERNHARDT: Defendant has no objection to

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1 (Off the record.)

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3 BY MS. ABDNOUR:

4 Q. Okay. Akia, there was -- and I was trying to
5 find it during the break and I can't find it. But
6 there was in -- in the discovery that we received from
7 UVA, there was an invoice from a law firm called
8 Flora & Pettit that was sent to you on July 21st of
9 2021 that referenced this case. The invoice amount
10 was \$5,000. Do you remember anything about that
11 invoice?

12 A. No.

13 MR. BERNHARDT: Objection. Form.

14 Q. Okay. Do you recall ever working with the
15 law firm Flora & Pettit?

16 A. The name sounds familiar, but I don't recall
17 working with them directly, no.

18 Q. Okay. I want to ask you now about the -- I'm
19 not going to use the right word that you used before,
20 but essentially the remedial measures I think that you
21 offered to the plaintiff in this matter at the end of
22 the case. Do you -- I'm assuming you would have

1 reviewed that e-mail; is that right? Or that letter?

2 A. Yes.

3 Q. Okay. And in that letter, she was offered
4 also \$5,000 to reimburse her for mental health therapy
5 and costs that she incurred through December of 2021.

6 Do you recall that?

7 A. Yes.

8 Q. Okay. Can you take me through how the
9 decision was made to offer that -- that resolution to
10 her?

11 A. And so the max amount that I recall at that
12 point to offer anyone for a finding of responsibility
13 is \$5,000 to reimburse for any sort of mental health
14 services someone would have needed during the pendency
15 of the investigation or in light of that, and also for
16 holistic type services.

17 And so that is a process that you would kind
18 of go through. There's a finding. You'd kind of
19 gauge based on the duration of sort of the allegations
20 at hand and things of that nature. This is what could
21 be a reasonable amount to assist someone after that.

22 Q. You said the maximum amount was \$5,000. What

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REPORTER CERTIFICATE

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I, JACQUELINE N. BENNETT, Registered Professional

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Reporter and Notary Public, certify:

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That the foregoing proceedings were taken before me at

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the time and place herein set forth, via

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video-conference, at which time the witness was put

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under oath by me;

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That the testimony of the witness and all objections

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made at the time of the examination were recorded

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stenographically by me and were thereafter

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transcribed;

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That the foregoing is a true and correct transcript of

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my shorthand notes so taken;

14

I further certify that I am not a relative or employee

15

of any attorney or of any of the parties not

16

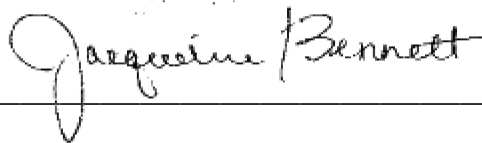
financially interested in this action.

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JACQUELINE N. BENNETT, RPR

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(Commissioned as Jacqueline N. Hagen)

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Dated: September 18, 2024